

Annual 47 C.F. R. & 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

February 22, 2010

Delta Telecom, Inc.
7881 Tuscany Dr.
Poland, OH 44514

Form 499 Filer ID: 825941

Name of Signatory: Millie Baldwin
Title of Signatory: President

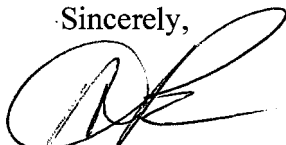
I, Millie Baldwin, certify that I am the officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47.C.F.R. & 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commissions's rules.

Delta Telecom has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year because Delta Telecom has had no business relation with data brokers in the past year. Delta Telecom will report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps Delta Telecom is taking to protect CPNI if any business is done with data brokers in the future.

Delta Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sincerely,



Millie Baldwin

Delta Telecom, Inc.
7881 Tuscany Dr.
Poland, OH 44514
(330)990-5004

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Statement explaining how Delta Telecom, Inc. is in Compliance with the Requirements set forth in section 64.2001 et seq. of the Commissions's rules.

Safeguarding CPNI

Delta Telecom protection of CPNI :

Customer initiated telephone contacts – callers must have the account number, billing name & address, and name of individual on file.

Passwords for telephone access to call detail

If caller requests call detail information, Delta Telecom will mail a duplicate phone bill to the address on the account or by calling the customer back at the number of record. All customer information is maintained in a password protected database that can be accessed only by authorized employees.

Delta Telecom does not have an online account access

In store visits

Customers must have valid photo identification for being an authorized person on the account

Opt-out/in approval customer approval

Delta Telecom does not work with any agents or marketing companies. Its employees are the only individuals that have access to customer authorized access to CPNI information. Marketing is only done after receiving proper authorization from the customer and remains in effect until the customer revokes or limits this approval or disapproval.

Training employees and express disciplinary process

Delta Telecom has a strict training process for protecting CPNI information. If an employee does not follow any of its policies the employees are reprimanded and are subject to termination of their employment with Delta Telecom. All of Delta Telecom employees who have access to CPNI receive training about CPNI compliance. Employees are required to sign a company manual as a condition of employment detailing how employees are expected to treat any confidential information.

Notice Requirements

Notification to law enforcement upon breach

Delta Telecom will notify the United States Secret Service (USSS) and Federal Bureau of Investigation (FBI) of any breach of its customer's CPNI electronically within seven days.

Delta Telecom shall notify law enforcement after the seventh day of any breach of its customer's CPNI. After completing the process of notifying law enforcement, the customer is notified.

Notice of account changes

Delta Telecom will mail the address of record any password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

Notification before use of CPNI

Prior to any solicitation for customer approval, Delta Telecom will provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. When using the customer's approval, Delta Telecom will use an individual notice.

Contents of notice

The notice will include that the customer has the right and carrier has the duty to protect the confidentiality of CPNI. A description of what constitutes a CPNI, which includes their right to disapprove these uses and their right to withdraw use at any time.

Notices will also provide steps in which to grant or deny access to CPNI and that denial of approval will not affect provisioning of any services that customer subscribes to. Customers are made aware that all notices will remain in effect until revoked by customer or limited by customer of either their approval or denial.

Notices do not encourage customers to freeze third party access to CPNI.

Any solicitation to customer by Delta Telecom will be in accordance to customer's CPNI rights.

Record Keeping Requirements

Establishing a Password

Authentication of a password by the customer is required. Backup methods are used if password is forgotten. For example, the last payment on the account must be provided.

A new password is required if the customer is unable to provide either the password or back up.

Records of related breaches

Delta Telecom will maintain for a minimum of two years any records of breaches and notices to USSS and FBI.

Records of Approval

Delta Telecom will maintain for a minimum of one year records of customer approval of CPNI.

Records of Notification

Delta Telecom will maintain for a minimum of one year records of customer notices of customers rights to restrict CPNI.

Records of Marketing Campaign using CPNI

Delta Telecom will maintain for a minimum of one year records of any marketing campaigns specific to the CPNI used and the products and services offered.

Records of Supervisory Review Process

Delta Telecom will maintain for a minimum of one year the records for the supervisory review for outbound marketing. All sales personnel are required to obtain supervisory approval prior to any outbound marketing requests for customer approval.